

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

New Bed ford

May 9, 1988

John Quarles Leslie S. Ritts Morgan, Lewis & Bockius 1800 M Street, N.W. Washington, D.C. 20036

Paul B. Galvani Ropes & Gray 225 Franklin Street Boston, MA 02110

Mary Ryan Daniel J. Gleason Nutter, McClennen & Fish One International Place Boston, MA 02110

Verne Vance Foley, Hoag & Eliot One Post Office Square Boston, MA 02109

David McLaughlin McLaughlin & Folan 448 County Street New Bedford, MA 02740

Re: New Bedford Harbor; Split Sampling

Dear Counsel:

This is in response to your letter of April 27, 1988, proposing that EPA arrange for splitting of samples during its monitoring of the Pilot Study project. As you are no doubt aware, EPA has proposed split sampling several times in the past in correspondence with Paul Galvani. EPA is quite willing to participate in an intercalibration study of the measurement of PCB's. We propose now to perform an intercalibration on four sediment samples from two locations in New Bedford Harbor. EPA will be taking sediment and water samples for analysis on the days immediately preceding the Pilot Dredging Study, and we propose that the samples to be split be taken at that time. EPA's analysis will be done at the Narragansett Laboratory, which will be performing the monitoring for the Pilot Study.

EPA proposes to use this opportunity to intercalibrate with Aerovox's expert, Dr. Brown. We request that homogenates be prepared from sediment samples previously reported on by Dr. Brown. We also suggest that Dr. Brown select the sediment samples so that one shows reductive dechlorination and the other does not. EPA will provide homogenates of two sections of a core from the area to be dredged in the Pilot Dredging Study. EPA would like the homogenates split, exchanged between the participants and analyzed in duplicate for PCBs (as Aroclors and as individual congeners) by each laboratory. EPA would insist, as a pre-condition to any such arrangement, on a simultaneous exchange of results.

EPA would be willing to consider additional intercalibration analysis of a small number of sediment or tissue samples under appropriate conditions. In addition, we would be willing to produce the results of other intercalibration exercises in which the Narragansett Laboratory has participated.

In respect to your request to be present during the Study, EPA is planning to arrange for public visits and observations of the Dredging Study. We will inform you as soon as such arrangements have been finalized. Such visits will necessarily be limited by safety considerations and by the resources which would have to be devoted to accommodating and accompanying visitors.

Finally, the Decision Criteria were mailed to your consultant, Everest Consulting, on April 27, 1988, as soon as they were available. It is our understanding that Everest has been designated to receive such documents on behalf of all the defendants.

We will look forward to your response to the split sampling proposed herein.

Yours, sincerely,

Charles C. Bering

Assistant Regional Counsel

cc: Ellen Mahan Nancy Preis

Frank Ciavatierri

Dave Hansen